

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THE LITTLE TIKES COMPANY,
an Ohio corporation,

Plaintiff,

V.

KID STATION TOYS, LTD.,
a Florida corporation,

KIDS STATION TOYS, LTD.,
a Hong Kong corporation,

KIDS STATION (U.S.) INCORPORATED,
a Florida corporation,

KIDS STATION TOYS
INTERNATIONAL, LTD.,
a Bermuda corporation,

KIDS STATION TOYS INTERNATIONAL
HOLDING, GmbH
a Switzerland corporation, and

MR. ELLIOT S. NEWMAN
an individual,

Defendants.

Case No. 1:08-cv-1935

Judge Joan B. Gottschall
Magistrate Judge Nan R. Nolan

SECOND JOINT MOTION FOR EXTENSION OF DISCOVERY PERIOD

In order to allow the parties to continue settlement discussions in this matter, the Plaintiff

The Little Tikes Company and Defendants Kids Station Toys, Ltd., a Hong Kong corporation (hereinafter, “Kid Station (HK)”), Kids Station (U.S.) Incorporated, a Florida corporation (hereinafter, “Kids Station (U.S.)”), Kids Station Toys International, Ltd., a Bermuda corporation (hereinafter, “Kids Station (Bermuda)”), Kids Station Toys International Holding, GmbH (hereinafter, “Kids Station (International)”) and Mr. Elliot S. Newman (“Newman”)

(collectively, the "Parties") respectfully move this Court for an extension of time to complete discovery related to the Permanent Injunction hearing by September 23, 2008. In support of this Motion, the Parties state as follows:

1. On May 1, 2008, this Court entered an Order setting a Permanent Injunction hearing for September 29, 2008 and the completion of all related discovery by July 30, 2008.

2. Subsequently, the Parties to this dispute engaged in settlement discussions that they were hopeful would resolve all matters at issue in this case.

3. As a result, on July 25, 2008, the Parties filed a Joint Motion for Extension of Discovery to enable them to devote their resources to resolving this case. On July 30, 2008, this Court granted the Joint Motion thereby giving the Parties an additional thirty (30) days to complete discovery.

4. Although the Parties are still engaged in settlement discussions that they believe will resolve all matters in this case, in the event they are unable to resolve this case each require additional time to complete discovery. Accordingly, in order to ensure the completion of discovery related to the upcoming Permanent Injunction hearing, the Parties have agreed to request an extension to complete discovery by September 23, 2008.

5. The Parties believe that settlement in this matter will be promoted by extending the discovery period to September 23, 2008, as it will preserve the Parties' resources and permit them to focus their attention on settling this case.

WHEREFORE, the Parties respectfully request the Court to extend the discovery period to September 23, 2008.

Dated: August 29, 2008

Respectfully submitted,

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Kids Station Toys International, Ltd.,
Kids Station Toys International Holding,
GmbH and Elliot S. Newman

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a copy of the foregoing Second Joint Motion for Extension of Discovery Period has been served upon the individuals listed below via the CM/ECF electronic filing service system on this 29th day of August 2008:

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